

CORRES. CONTROL  
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ACTION

DIST.	LTR	ENC
BORGMAN, K.A.		
BUHL, T.R.		
CARD, R.G.		
DEAN, C.		
EVANS, B.L.		
FERRERA, D.W.		
GILLISON, W.R.		
GRANT, B.A.		
HEDAHL, T.G.	X	
HERRING, C.L.	X	
HILL, J.A.		
HUEMAN, T.P.		
KELL, R.E.		
KELLY, G.M.		
LAREAU, D.M.		
LEE, E.M.		
MANI, V.		
MARTINEZ, L.A.		
McANALLY, J.L.		
McGOVERN, L.J.		
McKAY, R.		
McKIBBIN, J.G.		
MEADOWS, S.M.		
OKEY, R.		
O'BRIEN, G.D.		
PANGERSIS, P.A.		
SANDLIN, N.B.		
SHUMWAY, W.K.		
STAGG, R.		
STEELMAN, M.		
TUOR, N.R.		
TURNER, K.A.		
VOORHEIS, G.M.		
WALLER, C.A.		
Peter, K.	X	
Ticknor, K.	X	
Waller, C.A.	X	

CORRES. CONTROL	X	X
ADMN RECORD/080		
PATS/T130G		

Reviewed for Addressee  
Corres. Control RFP

11/1/95  
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

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Permit Mod 42  
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RFETS-CC-1

# STATE OF COLORADO



Colorado Department  
of Public Health  
and Environment

Comer, Governor  
Shwayder, Acting Executive Director

ated to protecting and improving the health and environment of the people of Colorado

ARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

Cherry Creek Dr. S. 222 S. 6th Street, Room 232  
er, Colorado 80222-1530 Grand Junction, Colorado 81501-2768  
e (303) 692-3300 Phone (303) 248-7164  
303) 759-5355 Fax (303) 248-7198

October 25, 1995

Ms. Jesse Roberson  
Assistant Manager for Environmental Programs  
U.S. Department of Energy  
P.O. Box 928  
Golden, CO 80402-0928

RE: Decision Declaration Replacement Pages for Operable Units 15 and 16

Dear Ms. Roberson:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (CDPHE), is hereby issuing replacement pages for the Rocky Flats Environmental Technology Site (RFETS) Hazardous Waste Permit. The enclosed declarations summarize the Corrective Action Decisions/Record of Decisions as agreed to by the U.S. Environmental Protection Agency, the U.S. Department of Energy, and CDPHE for operable units (OUs) 15 and 16. The enclosed pages will replace pages 24 and 25 of Table 6 - Milestone Schedules (Section XV of the RFETS Permit) for OUs 15 and 16.

If you have any questions regarding this matter, please contact Chris Gilbreath at (303) 692-3371.

Sincerely,

Joe Schieffelin  
Rocky Flats Unit Leader  
Hazardous Waste Control Program

cc: S. Tarlton, CDPHE-OE  
T. Rehder, EPA  
M. Aguilar, EPA  
K. Peter, Kaiser-Hill, T-130C  
K. Ticknor, RMRS, T-130C  
Jefferson County Health Department

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

A-OU15-000274

## Operable Unit 15: Inside Building Closures Corrective Action Decision/Record of Decision

### Statement of Basis and Purpose

This decision document presents the selected remedial action/corrective action for the Rocky Flats Operable Unit (OU) 15: Inside Building Closures. The selected remedial action was chosen in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980 as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, the Colorado Hazardous Waste Act (CHWA) and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The Resource Conservation and Recovery Act (RCRA) is administered through the CHWA by the Colorado Department of Public Health and the Environment (CDPHE). OU15 was investigated and a Preferred Alternative was selected in compliance with the Federal Facility Agreement and Consent Order Inter-Agency Agreement (IAG) signed by the U.S. Department of Energy (DOE), the State of Colorado, and the U.S. Environmental Protection Agency (EPA) on January 22, 1991.

### Description of the Selected Remedies

OU15: Inside Building Closures is composed of six Individual Hazardous Substance Sites (IHSSs). The preferred alternative for OU 15 consists of the following actions: 1) Clean Closure under RCRA for all six of the OU15 IHSSs; 2) a No Action CERCLA decision for IHSSs 178, 211 and 217; and 3) a deferral of any CERCLA actions at IHSSs 179, 180, and 204 until final disposition of their respective buildings. RCRA closure certification for the six IHSSs, signed by an independent registered professional engineer, has been approved by CDPHE. The No Action CERCLA decision for IHSSs 178, 211, and 217 is based upon the NCP, which provides for the selection of a No Action alternative when a site or OU is already in a protective state. OU15 IHSSs 179, 180, and 204 will be closed as IAG IHSSs and any future CERCLA action decisions will be made based upon the ultimate disposition of the buildings, inclusive of the physical areas previously described as OU15 IHSSs. Evaluation of remedial alternatives and closure activities included waste minimization considerations.

### Declaration Statement

DOE has determined that no remedial action is necessary to be protective of human health and the environment at IHSSs 178, 211, and 217 because they meet the clean closure requirements of the Rocky Flats RCRA Permit (RFRP) and the Federal occupational radiation protection standards. At IHSSs 179, 180, and 204, no remedial action is currently necessary because they meet the clean closure requirements of the RFRP and the Rocky Flats radiological control program is in compliance with Applicable or Relevant and Appropriate Requirements (ARARs)/To Be Considered (TBC) criteria and other identified protective standards. Future CERCLA actions may be required at the time of ultimate disposition of the buildings. Because the remedy will not result in hazardous substances remaining onsite above ARARs, TBCs, or protective standards, a five-year review is not required.

## **Operable Unit 16: Low Priority Sites Corrective Action Decision/Record of Decision**

### **Statement of Basis and Purpose**

This decision document presents the selected remedial action for the Rocky Flats Plant Operable Unit (OU) 16: Low Priority Sites, located near Golden, Colorado. The selected remedial action was chosen in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, the Colorado Hazardous Waste Act (CHWA) and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). OU 16 was investigated and a final No Further Action Justification Document (NFAJD) was approved in compliance with the Federal Facility Agreement and Consent Order signed by the U.S. Department of Energy (DOE), the State of Colorado, and the U.S. Environmental Protection Agency (EPA) on January 22, 1991.

### **Description of the Selected Remedy: No Action**

OU16: Low Priority Sites was originally composed of seven Individual Hazardous Substance Sites (IHSSs). The decision for a "No Action" remedy for five of the IHSSs (i.e., 185, 192, 193, 194, and 195) was based upon the NCP which provides for the selection of a No Action alternative when a site or OU is already in a protective state. The Risk Evaluation performed in the Final "No Further Action Justification" document determined that these IHSSs were in a protective state and presented no unacceptable risk to human health and the environment. Further investigation has been recommended for IHSS 196 as part of OU5 and for IHSS 197 as part of OU13.

### **Declaration Statement**

DOE has determined that no remedial action is necessary to be protective of human health and the environment at *Rocky Flats Plant Operable Unit 16: Low Priority Sites*. Because the remedy will not result in hazardous substances remaining onsite above health-based levels, a five-year review is not required.